

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

VICTOR MANUEL TORRES SERRANO

DEBTOR

CASE NO. 19-04833 ESL

CHAPTER 13

DEBTOR'S MOTION AMENDING SCHEDULES A/B

TO THE HONORABLE COURT:

COMES NOW the debtor through the undersigned attorney and very respectfully states and prays as follows:

1. On August 23, 2019 debtor filed a Voluntary Petition under Chapter 13 of the Bankruptcy Code. See docket entry no. 1.
2. Debtor hereby amends *Schedule A/B* to include the security deposit of his Residential Lease Contract.
3. The debtors are attaching to this motion an Amended Declaration about an Individual Debtor's Schedules in compliance with LBR 1009-1.

WHEREFORE, debtor requests from this Honorable Court to take notice of the preceding facts and amendment.

RESPECTFULLY SUBMITTED

In Caguas, Puerto Rico, this 20 day of September 2019.

NOTICE: Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk's office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

CERTIFICATE OF SERVICE: I CERTIFY that on this same date the foregoing document has been electronically filed WITH THE Clerk of the Court using the CM/ECF system which sends notified of such filing to all system's participants, including the U.S. Trustee's Office and the Trustee.


/s/ CARLOS A. RUIZ RODRIGUEZ

USDC-PR 210009

Attorney for Debtor

P.O. Box 1298, Caguas, PR 00726-1298

Phone: (787) 286-9775 Fax: (787) 747-2174

carlosalbertoruizquiebras@gmail.com

Fill in this information to identify your case:

Debtor 1 VICTOR MANUEL TORRES-SERRANO

Debtor 2 _____

(Spouse, if filing)

United States Bankruptcy Court for the District of Puerto Rico

Case number 19-04833
(If known)

☒ Check if this is an amended filing

Official Form 106A/B Amended Schedule A/B: Property

12/15

In each category, separately list and describe items. List an asset only once. If an asset fits in more than one category, list the asset in the category where you think it fits best. Be as complete and accurate as possible. If two married people are filing together, both are equally responsible for supplying correct information. If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write your name and case number (if known). Answer every question.

Part 1: Describe Each Residence, Building, Land or Other Real Estate You Own or Have an Interest in

1. Do you own or have any legal or equitable interest in any residence, building, land, or similar property?

- ☒ No. Go to Part 2.
☐ Yes. Where is the property?

2. Add the dollar value of the portion you own for all of your entries from Part 1, including any entries for pages you have attached for Part 1. Write that number here.

Part 2: Describe Your Vehicles

Do you own, lease, or have legal or equitable interest in any vehicles, whether they are registered or not? Include any vehicles you own that someone else drives. If you lease a vehicle, also report it on *Schedule G: Executory Contracts and Unexpired Leases*.

3. Cars, vans, trucks, tractors, sport utility vehicles, motorcycles

- ☐ No.
☒ Yes.

3.1 Make: NISSAN
Model: VERSA S
Year: 2013
Approximate mileage: 97851
Other information:

Who has an interest in the property? Check one

- ☒ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☐ At least one of the debtors and another
☐ Check if this is community property (see instructions)

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?	Current value of the portion you own?
\$4,141.00	\$4,141.00

3.2 Make: MAZDA
Model: 6S
Year: 2004
Approximate mileage: 145235
Other information: ; OWN BY DEBTOR BUT IN POSSESSION OF ANOTHER

Who has an interest in the property? Check one

- ☐ Debtor 1 only
☐ Debtor 2 only
☐ Debtor 1 and Debtor 2 only
☒ At least one of the debtors and another
☐ Check if this is community property (see instructions)

Do not deduct secured claims or exemptions. Put the amount of any secured claims on *Schedule D: Creditors Who Have Claims Secured by Property*.

Current value of the entire property?	Current value of the portion you own?
\$2,273.00	\$2,273.00

Debtor 1 VICTOR MANUEL TORRES-SERRANO

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4. **Watercraft, aircraft, motor homes, ATVs and other recreational vehicles, other vehicles, and accessories**
Examples: Boats, trailers, motors, personal watercraft, fishing vessels, snowmobiles, motorcycle accessories

☒ No.
☐ Yes.

5. **Add the dollar value of the portion you own for all of your entries from Part 2, including any entries for pages you have attached for Part 2. Write that number here**

\$6,414.00

Part 3: Describe Your Personal and Household Items

Do you own or have any legal or equitable interest in any of the following items? (List the current value of the portion you own. Do not deduct secured claims or exemptions)

6. **Household goods and furnishings**

Examples: Major appliances, furniture, linens, china, kitchenware

☐ No

☒ Yes (STOVE \$50.00; WASHING MACHINE \$50.00; POTS \$20.00; LIVING ROOM \$100.00; TOOLS \$100.00; MICROWAVE \$20.00; \$340.00, D1)

\$340.00

7. **Electronics**

Examples: Televisions and radios; audio, video, stereo, and digital equipment; computers, printers, scanners; music collections; electronic devices including cell phones, cameras, media players, games

☐ No

☒ Yes (1 TV \$100.00; GAME CONSOLE \$80.00; 2 CELLPHONES \$150.00 \$330.00, D1)

\$330.00

8. **Collectibles of value**

Examples: Antiques and figurines; paintings, prints, or other artwork; books, pictures, or other art objects; stamp, coin, or baseball card collections; other collections, memorabilia, collectibles

☒ No

☐ Yes

9. **Equipment for sports and hobbies**

Examples: Sports, photographic, exercise, and other hobby equipment; bicycles, pool tables, golf clubs, skis; canoes and kayaks; carpentry tools; musical instruments

☒ No

☐ Yes

10. **Firearms**

Examples: Pistols, rifles, shotguns, ammunition, and related equipment

☒ No

☐ Yes

11. **Clothes**

Examples: Everyday clothes, furs, leather coats, designer wear, shoes, accessories

☐ No

☒ Yes (WEARING CLOTHES \$1,200.00, D1)

\$1,200.00

12. **Jewelry**

Examples: Everyday jewelry, costume jewelry, engagement rings, wedding rings, heirloom jewelry, watches, gems, gold, silver

☐ No

☒ Yes (JEWELRY \$70.00, D1)

\$70.00

13. **Non-farm animals**

Examples: Dogs, cats, birds, horses

☐ No

☒ Yes (DOG \$1.00, D1)

\$1.00

14. **Any other personal and household items you did not already list, including any health aids you did not list**

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☒ No
☐ Yes

15. Add the dollar value of all of your entries from Part 3, including any entries for pages you have attached for Part 3. Write that number here

\$1,941.00

Part 4: Describe Your Financial Assets

Do you own or have any legal or equitable interest in any of the following? (List the current value of the portion you own. Do not deduct secured claims or exemptions)

16. Cash

Examples: Money you have in your wallet, in your home, in a safe deposit box, and on hand when you file your petition

☐ No

☒ Yes CASH ON HAND \$10.00 (D1) \$10.00

17. Deposits of money

Examples: Checking, savings, or other financial accounts; certificates of deposit; shares in credit unions, brokerage houses, and other similar institutions. If you have multiple accounts with the same institution, list each.

☐ No

☒ Yes BPPR CHECKING ACCT #6289 \$383.95 (D1) \$383.95

18. Bonds, mutual funds, or publicly traded stocks

Examples: Bond funds, investment accounts with brokerage firms, money market accounts

☒ No

☐ Yes \$0.00

19. Non-publicly traded stock and interests in incorporated and unincorporated businesses, including an interest in an LLC, partnership, and joint venture

☒ No

☐ Yes \$0.00

20. Government and corporate bonds and other negotiable and non-negotiable instruments

Negotiable instruments include personal checks, cashiers' checks, promissory notes, and money orders. *Non-negotiable instruments* are those you cannot transfer to someone by signing or delivering them.

☒ No

☐ Yes \$0.00

21. Retirement or pension accounts

Examples: Interests in IRA, ERISA, Keogh, 401(k), 403(b), thrift savings accounts, or other pension or profit-sharing plans

☒ No

☐ Yes \$0.00

22. Security deposits and prepayments

Your share of all unused deposits you have made so that you may continue service or use from a company. *Examples:* Agreements with landlords, prepaid rent, public utilities (electric, gas, water), telecommunications companies, or others

☐ No

☒ Yes PREPA \$125.00 (D1) \$125.00

Security deposit of Residential Lease Contract \$500.00 (D1) \$500.00

23. Annuities (A contract for a periodic payment of money to you, either for life or for a number of years)

☒ No

☐ Yes \$0.00

24. Interests in an education IRA as defined in 26 U.S.C. § 530(b)(1) or under a qualified state tuition plan as defined in 26 U.S.C. § 529(b)(1).

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☒ No
☐ Yes \$0.00

25. Trusts, equitable or future interests in property (other than anything listed in line 1), and rights or powers exercisable for your benefit

☒ No
☐ Yes \$0.00

26. Patents, copyrights, trademarks, trade secrets, and other intellectual property
Examples: Internet domain names, websites, proceeds from royalties and licensing agreements

☒ No
☐ Yes \$0.00

27. Licenses, franchises, and other general intangibles

Examples: Building permits, exclusive licenses, cooperative association holdings, liquor licenses, professional licenses

☒ No
☐ Yes \$0.00

28. Tax refunds owed to you

Give specific information about them, including whether you already filed the returns and the tax years

☒ No
☐ Yes \$0.00

29. Family support

Examples: Past due or lump sum alimony, spousal support, child support, maintenance, divorce settlement, property settlement

☒ No
☐ Yes \$0.00

30. Other amounts someone owes you

Examples: Unpaid wages, disability insurance payments, disability benefits, sick pay, vacation pay, workers' compensation, Social Security benefits; unpaid loans you made to someone else

☒ No
☐ Yes \$0.00

31. Interests in insurance policies

Examples: Health, disability, or life insurance; health savings account (HSA); credit, homeowner's, or renter's insurance. Name the insurance company of each policy and the beneficiary, and list its value

☒ No
☐ Yes \$0.00

32. Any interest in property that is due you from someone who has died

If you are the beneficiary of a living trust, expect proceeds from a life insurance policy, or are currently entitled to receive property because someone has died.

☐ No
☒ Yes (6 HEIRS) DEBTOR HAS A 16.66% INTEREST IN THE ESTATE OF MS. LOURDES SERRANO MALDONADO (DEBOTOR'S MOTHER). THE ESTATE OWNS A 3 BEDROOMS, 1 BATHROOM, SMALL UNFINISHED HOUSE LOCATED AT BRISAS LAS MARIAS, ARIES STREET #129 VIEQUES, PR. THE VALUE IS ESTIMATED IN \$50,000.00. \$6,606.00 (D1)..... \$6,606.00

33. Claims against third parties, whether or not you have filed a lawsuit or made a demand for payment

Examples: Accidents, employment disputes, insurance claims, or rights to sue

☒ No
☐ Yes \$0.00

34. Other contingent and unliquidated claims of every nature, including counterclaims of the debtor and rights to set off claims

☒ No
☐ Yes \$0.00

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35. Any financial assets you did not already list

☒ No
☐ Yes

\$0.00

36. Add the dollar value of all of your entries from Part 4, including any entries for pages you have attached for Part 4. Write that number here

\$7,624.95

Part 5: Describe Any Business-Related Property You Own or Have an Interest In. List any real estate in Part 1.

37. Do you own or have any legal or equitable interest in any business-related property?

☒ No. Go to part 6.
☐ Yes. Go to line 38.

Part 6: Describe Any Farm- and Commercial Fishing-Related Property You Own or Have an Interest In. If you own or have an interest in farmland, list it in Part 1.

46. Do you own or have any legal or equitable interest in any farm- or commercial fishing-related property?

☒ No. Go to part 7.
☐ Yes. Go to line 47.

Part 7: Describe All Property You Own or Have an Interest in That You Did Not List Above

53. Do you have other property of any kind you did not already list?

Examples: Season tickets, country club membership

☒ No
☐ Yes

\$0.00

54. Add the dollar value of all of your entries from Part 7, including any entries for pages you have attached for Part 7. Write that number here

Part 8: List the Totals of Each Part of this Form

55. Part 1: Total real estate, line 2	
56. Part 2: Total vehicles, line 5	<u>\$6,414.00</u>
57. Part 3: Total personal and household items, line 15	<u>\$1,941.00</u>
58. Part 4: Total financial assets, line 36	<u>\$7,624.95</u>
59. Part 5: Total business-related property, line 45	
60. Part 6: Total farm- and fishing-related property, line 52	
61. Part 7: Total other property not listed, line 54	
62. Total personal property. Add lines 56 through 61	<u>\$15,979.95</u>
63. Total of all property on Schedule A/B. Add line 55 + line 62	<u>\$15,979.95</u>

Fill in this information to identify your case:

Debtor 1 VICTOR MANUEL TORRES-SERRANO
Debtor 2 _____
(Spouse, if filing)
United States Bankruptcy Court for the District of Puerto Rico
Case number 19-04833
(If known)

☒ Check if this is an amended filing

Official Form 106Dec

Amended Declaration About an Individual Debtor's Schedules

12/15

If two married people are filing together, both are equally responsible for supplying correct information.

You must file this form whenever you file bankruptcy schedules or amended schedules. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$250,000, or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Did you pay or agree to pay someone who is NOT an attorney to help you fill out bankruptcy forms?

- ☒ No
☐ Yes. Name of person N/A. Attach *Bankruptcy Petition Preparer's Notice, Declaration, and Signature* (Official Form 119).

Under penalty of perjury, I declare that I have read the summary and schedules filed with this declaration and that they are true and correct.

/s/ VICTOR MANUEL TORRES-SERRANO
Signature of Debtor 1

09/20/2019
Date

Signature of Debtor 2

09/20/2019
Date